

Exhibit
2.

40-75

1 FARLEY

2 moments ago that the distance between where
3 the inmate was waiting for the examination
4 and the place where the examination took
5 place on the occasions that you were
6 working at Rose M. Singer at that clinic
7 was about a distance of five feet away?

8 A. Yes. Give or take a foot.

9 Q. When an inmate was being
10 examined at Rose M. Singer, are you able to
11 see into the cubicle where the examination
12 is being conducted?

13 A. Um, me personally?

14 Q. Yes.

15 A. No.

16 Q. When you were assigned to the
17 clinic at Rose M. Singer on the occasions
18 that you were so assigned, do you recall
19 how many doctors you would see on the tour
20 that day?

21 A. No.

22 Q. Do you recall how many nurses
23 you would see on a typical tour when you
24 were assigned to the clinic at Rose M.
25 Singer?

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2 A. Two or three.

3 Q. So, two or three nurses, but
4 you don't know how many doctors; correct?

5 A. Yes.

6 Q. And were those nurses males or
7 females?

8 A. Females.

9 Q. Did you ever receive any
10 training from the Department of Corrections
11 concerning an officer being present when an
12 inmate is being examined by a doctor at the
13 Rose M. Singer center?

14 A. No.

15 Q. And it's your testimony that
16 you've never been present when a female
17 inmate is being examined by a doctor at the
18 Rose M. Singer center; correct?

19 A. Correct.

20 MR. BROWN: I ask that this
21 picture be marked as Plaintiff's
22 Exhibit 1.

23 (Plaintiff's Exhibit 1 was
24 marked for identification, as of this
25 date.)

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2 Q. Have you ever seen her
3 signature before?

4 A. Yes.

5 MR. BROWN: I'm going to ask
6 that Bates stamped number 4 also
7 provided by the defendants be marked
8 as Plaintiff's Exhibit 2 at this
9 time. It's the discharge checklist.
10 (Plaintiff's Exhibit 2 was
11 marked for identification, as of this
12 date.)

13 Q. And I'm going to show this to
14 the witness at this time, and I will ask
15 you to take a look at the signatures on the
16 bottom. Officer, have you had an
17 opportunity to examine the signatures at
18 the bottom of Plaintiff's Exhibit 2?

19 A. Yes.

20 Q. And do you recognize those
21 signatures on Plaintiff's Exhibit 2?

22 A. I recognize the top signature.

23 Q. And whose signature do you
24 recognize that to be?

25 A. Captain Carr.

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2 Plaintiff's Exhibit 2, again. I'm going to
3 ask you to take a look at the signature
4 underneath Captain Carr's signature and ask
5 you again if you recognize that signature.

6 A. I still can't really make it
7 out. I mean, this one. The second where
8 he printed kind of looks like it may say
9 Johnson, but the actual signature --

10 Q. That's fine.

11 Can you explain for the record
12 what sort of training you would receive if
13 an inmate complained to you about the
14 conduct of a doctor at the Rose M. Singer
15 center? What would you do?

16 A. It would be considered an
17 incident.

18 Q. And what would your duties
19 entail if that were to happen?

20 A. I would have to fill out an
21 incident report. I would have to get
22 voluntary inmate state. I would also have
23 to notify my area captain. And if they had
24 any injuries, I would have to also fill out
25 an injury report.

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2 A. No, I don't recall.

3 Q. Do you recall if you had to
4 testify in connection with those -- with
5 either of those incidents?

6 A. No.

7 Q. On October 19 of 2009, do you
8 recall any inmate complaining to you about
9 being sexually assaulted by any doctor at
10 Rose M. Singer?

11 A. No.

12 Q. No, you don't recall or no, it
13 didn't happen?

14 A. No, I don't recall.

15 Q. And it's also your testimony
16 that you never received any training in
17 connection with what sort of incident has
18 to be reported when an inmate is
19 complaining about a member of the
20 Department of Corrections?

21 A. Correct.

22 Q. Are any male Department of
23 Corrections personnel ever assigned to the
24 clinic at Rose M. Singer?

25 A. Yes.

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2 examined?

3 A. Yes.

4 Q. If an inmate were examined by a
5 physician and then left the area to go to
6 the lab, let's say to get some blood work
7 and then was called back by the doctor to
8 be examined again, to your knowledge, would
9 that deposition form reflect that they went
10 in once and went to the lab and then came
11 out and were seen a second time?

12 A. They only get the deposition
13 form when they're completely finished with
14 the clinic. If they're still in the clinic
15 area for whatever reason, they don't get a
16 deposition form.

17 Q. So, from the moment they walked
18 through this door until the moment they
19 leave that door, that's the time in and out
20 for purposes of the deposition report?

21 A. We have to have an accurate
22 timeframe for this (indicating).

23 Q. Okay.

24 MR. BROWN: I'm just going to
25 call for production of that, because